

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS AT BOSTON

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ALICIA HASLAM,

Plaintiff,

-v-

CIVIL NO. 05-10809 RWZ

SHUSTER LABORATORIES, INC.

Defendant.

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**PLAINTIFF'S MOTION TO COMPEL TESTIMONY  
FROM NON-PARTY WITNESSES AND FOR SANCTIONS**

The Plaintiff in the above captioned matter hereby moves for an order compelling testimony from non-party witnesses Maryann Sullivan and Scott Williams on all discussions with or concerning Defendant's counsel.

As grounds in support, the Plaintiff represents that there is no legitimate attorney-client relationship between these witnesses and the Defendant's counsel and this is an appropriate subject of discovery.

Plaintiff also seeks sanctions.

A memorandum of facts and law is attached hereto and filed herewith.

WHEREFORE, for all of the foregoing reasons, the Plaintiff respectfully requests that this Motion be GRANTED.

**Certification pursuant to Local Rule 7.2(A)(2)**

The undersigned hereby certifies that pursuant to Local Rule 7.1(A)(2), counsel for the parties conferred at least twice in a good faith attempt to resolve and/or narrow the issues presented in the motion.

Respectfully submitted:  
THE PLAINTIFF  
Alicia Haslam

By her counsel:

DATED: July 19, 2006

/s/ William J. McLeod  
William J. McLeod, BBO. 560572  
McLeod Law Offices, PC  
77 Franklin Street  
Boston, MA 02110  
(617) 542-2956/phone  
(617) 695-2778/fax  
wjm@mcleodlawoffices.com